

TH:KMT/NMA
F. #2021R00304

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

COREY WILLIAMS,
also known as “Moncler,”
“Mellz” and “Moncler Mellz,”

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MATTHEW WIEDEMER, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about and between June 6, 2019 and June 14, 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant COREY WILLIAMS, also known as “Moncler,” “Mellz” and “Moncler Mellz,” together with others, did knowingly and intentionally conspire to execute a scheme and artifice to defraud financial institutions, to wit: HSBC Bank USA, N.A. and Teachers Federal Credit Union, and to obtain moneys, funds, credits and other property owned by, and under the custody and control of, such financial institutions, by means of one or more materially

TO BE FILED UNDER SEAL

AFFIDAVIT AND
COMPLAINT IN SUPPORT
OF AN APPLICATION FOR
AN ARREST WARRANT

21-MJ-917

(18 U.S.C. §§ 1028A and 1349)

false and fraudulent pretenses, representations and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349)

On or about and between June 6, 2019 and June 14, 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant COREY WILLIAMS, also known as “Moncler,” “Mellz” and “Moncler Mellz,” together with others, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), did knowingly and intentionally transfer, possess and use, without lawful authority, one or more means of identification of another person, to wit: Jane Doe, an individual whose identity is known to the affiant, knowing that the means of identification belonged to another person.

(Title 18, United States Code, Sections 1028A and 2)

The source of your deponent’s information and the grounds for his belief are as follows:¹

1. I have been an FBI Special Agent since approximately 2017, and I am assigned to the FBI’s Brooklyn/Queens Resident Agency, where I investigate narcotics distribution and trafficking, firearms offenses, violent crimes, and gang activity. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. On or about May 16, 2020 officers of the New York City Police Department seized a cellular telephone (the “Device”) from an individual (hereinafter “CC-1”) incident to his arrest.² On May 22, 2020, the Honorable Steven M. Gold, Magistrate Judge for the Eastern District of New York, authorized a search warrant for the Device. On November 6, 2020, the Honorable Steven M. Gold authorized a supplemental search warrant for the Device, expanding the categories of information the government was entitled to seize from it.

3. There is probable cause to believe that the Device was owned and controlled by WILLIAMS before it was seized from CC-1.

a. First, a cooperating witness (hereinafter, the “CW”³) has informed me that CC-1 and WILLIAMS are both members of a gang known as “Bamalife” that is based in the part of East New York, Brooklyn, known as the “Bamas.”

² CC-1 was subsequently arrested on a federal complaint and indicted in the Eastern District of New York with two counts of being a felon in possession of ammunition, in violation of 18 U.S.C. § 922(g), with each count corresponding to a different shooting CC-1 committed.

³ The CW was a member of the 5-9 Brims “set,” or subgroup of the Bloods street gang, and also a member of another geographically based gang in East New York. He was arrested and charged in the Eastern District of New York with being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g). He has pleaded guilty, pursuant to a cooperation agreement, to racketeering conspiracy, in violation of 18 U.S.C. § 1962(d), Hobbs Act robbery, in violation of 18 U.S.C. § 1951, brandishing a firearm in connection with the Hobbs Act robbery, in violation of 18 U.S.C. § 924(c), and being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g), in hopes of receiving leniency at sentencing. The information provided by the CW has been corroborated by other sources, including surveillance video and social media pages.

b. Second, my review of the Device indicates that it was associated with several phone numbers, two of which had an 803 area code.⁴ I am aware that 803 is a South Carolina area code and that WILLIAMS has family members who live in South Carolina. I am further aware that WILLIAMS currently has a South Carolina driver's license with an address in Rembert, South Carolina.

c. Third, the Device contains text messages in which the user of the Device identifies himself as "Moncler" or "Mellz," which are aliases used by WILLIAMS.⁵ For example, on December 13, 2018, the user of the Device sent a text message in which he wrote "I'm Moncler." On March 24, 2019, a person using a cellular phone associated with a phone number ending in 5356 sent a text message to the user of the Device and asked "Who is this." The user of the Device responded in part "This Mellz." On May 11, 2019, a person using a cellular phone associated with a phone number ending in 2645 asked the user of the Device "Who this." The user of the Device responded "Mellz." On December 9, 2019, a person using a cellular phone associated with a phone number

⁴ I am aware from my training and experience that the user of a cellular telephone can change the phone number associated with his phone by, for example, replacing the SIM card used in the phone.

⁵ The CW has informed me that WILLIAMS is known as "Moncler Mellz." Further, I have reviewed a music video for a song called "Press It Up" that is publicly available on YouTube, and the song is credited to "Moncler Mellz." I and other law enforcement agents recognize WILLIAMS as the individual in the music video performing as "Moncler Mellz." See, e.g., <https://www.youtube.com/watch?v=aLaY80RPrr4> (music video for "Press It Up," in which WILLIAMS discusses committing fraud). In the video, WILLIAMS displays a machine that another individual appears to use to stamp information on blank credit cards. Others in the video display what appear to be firearms. I have also reviewed information that is publicly available on the Instagram page associated with the username "darealmonclermellz," and the photographs posted to the page indicate that WILLIAMS owns and controls the page.

ending in 4603 sent a message to the Device asking “Who dis.” The user of the Device responded “Mellz.” The Device was also used to send and receive email messages using the email address “monclermellz77@gmail.com.”

4. There is probable cause to believe that, in and about and between June 6, 2019 and June 14, 2019, WILLIAMS used the Device to commit, among other offenses, bank fraud and aggravated identity theft. During that period, WILLIAMS and another individual whose identity is known to me and who is also a member of the “Bamalife” gang (hereinafter “CC-2”) executed, attempted to execute and conspired to execute a check fraud scheme using an HSBC bank account number belonging to an actual person, without the knowledge or consent of that person (hereinafter Jane Doe) In the course of that scheme, WILLIAMS and CC-2 transferred, possessed and used a means of identification of another individual, that is, the name of Jane Doe and information associated with Jane Doe’s HSBC bank account, to create a fraudulent check, which WILLIAMS then deposited into a co-conspirator’s bank account with Teachers Federal Credit Union (“TFCU”).

a. First, between November 14, 2018 and August 6, 2019, WILLIAMS corresponded by text message with CC-2, who was using a cellular phone associated with a phone number ending in 7006 (the “7006 Number”).⁶

⁶ In the Device, the 7006 Number is saved as a “contact” that is associated with the name “horse.” I am aware from discussions with the CW and my review of information on Facebook and Instagram accounts that CC-2 uses the alias “Horse” and “Bossman Horse.” In the course of the text messages between CC-2 and the user of the Device, the user of the Device identified himself using WILLIAMS’s aliases. For example, from November 14, 2018 to February 7, 2019, the user of the Device sent text messages to CC-2 using a phone number beginning with an 929 area code and ending in 6931. On March 23, 2019, the user of the Device began sending messages to CC-2 using a phone number beginning with an 803 area code and ending in 8152 (the “8152 Number”). After the user of the Device sent two

b. On June 11, 2019 at 7:33 p.m., WILLIAMS sent a text message to CC-2 to which he attached a photograph of the front of a check drawn on Jane Doe's HSBC account (the "Check"). The Check has an HSBC logo on it, is dated May 30, 2019, and bears the name and address of Jane Doe. The "pay to the order of" line is complete, the check is written for \$2,000 and it is signed. The "memo" line references a "bill #." I interviewed Jane Doe and she confirmed that the Check is a valid check that she wrote. I have reviewed bank records for Jane Doe's HSBC account, and those records indicate that the Check was deposited into the recipient's account on or about May 30, 2019 and drawn on Jane Doe's HSBC account.

c. On June 11, 2019 at 7:33 p.m., five seconds after WILLIAMS sent the image of the Check to CC-2, WILLIAMS sent another text message to CC-2 in which WILLIAMS wrote "Cook this for me for tfcu." Approximately two minutes and 24 seconds later, CC-2 responded in part "You want me to cook it for tomorrow," to which WILLIAMS replied approximately 40 seconds later, "Yeah." Approximately one minute and 10 seconds later, CC-2 wrote "Ight [all right] bet say no[]more go[t] you." Based on the information provided below, there is probable cause to believe that "tfcu" is a reference to Teachers Federal Credit Union and that, in requesting that CC-2 "cook" the check, WILLIAMS was asking CC-2 to prepare a counterfeit check using the valid account information from the Check.

messages to CC-2 using the 8152 Number, CC-2 responded, "Who this." The user of the Device responded "Moncler I got the new # my you" (sic). Based on the context of this message, there is probable cause to believe that the user of the Device was identifying himself as "Moncler," i.e., WILLIAMS, and informing CC-2 that he had a new phone number ("new #").

d. On June 12, 2019 at approximately 12:39 p.m., WILLIAMS wrote to CC-2 “don’t forget to cook for the tfcu I gotta go to l.i and do that.” Based on the information that follows, there is probable cause to believe that “l.i.” in this text is a reference to Long Island, New York.

e. Approximately 30 seconds later, CC-2 asked “What time you going ??,” to which WILLIAMS responded approximately 30 seconds later, “Whenever you get done cooking that shit.”

f. At 2:47 p.m., WILLIAMS asked “Wyd?” Based on the context of this text, there is probable cause to believe “Wyd?” means “What [are] you doing?” CC-2 responded less than a minute later, “Cooking up now from your shit.”

g. At 5:47 p.m., CC-2 wrote to WILLIAMS, “They didn’t say how much to cook it for” and at 5:51 p.m. he wrote “Tell me what about.” Nine seconds later, CC-2 appeared to correct the last word in his previous text by writing “Amount.” Approximately two minutes and 30 seconds later, WILLIAMS wrote “Do it for like 27.” Five seconds later CC-2 wrote “Ight bet,” and then three seconds later “It’s done.” At 5:55 p.m., CC-2 wrote “Bet come grab it.”

h. On June 13, 2019 at approximately 3:52 p.m., WILLIAMS wrote to CC-2 “I’m downstairs.”

i. On June 13, 2019 at approximately 5:54 p.m., WILLIAMS sent a text message to CC-2 with an image of what appears to be an ATM receipt from the TFCU branch located at “Merrick Commons #1638” in “Merrick NY 11566.” The receipt is dated June 13, 2019, time stamped 5:10 p.m. and it shows a deposit of \$2,700 into a checking account. I am aware that Merrick, New York, is on Long Island.

j. Records obtained from TFCU indicate that on June 14, 2019, a check for \$2,700 was credited to a TFCU account belonging to an individual whose identity is known to me (“CC-3”). TFCU also provided the government with a copy of the check and it is in fact written for \$2,714.09 to CC-3 from “Business Resources Services.” The check bears check number 758 (hereinafter, “Check 758”)

k. Check 758 purports to be drawn on an account with “Signature Bank,” but the account number written along the bottom of Check 758 is in fact Jane Doe’s HSBC account number. The routing number on the bottom of Check 758 is also associated with HSBC, not Signature Bank. There is therefore probable cause to believe that Check 758 is a counterfeit check that WILLIAMS and CC-2 prepared using information from the valid Check.

l. TFCU records indicate that on June 14, 2019, after Check 758 was deposited into CC-3’s TFCU account, a user of CC-3’s account withdrew \$201.50 from an ATM located at 640 Blake Avenue in East New York, Brooklyn. I am aware that 640 Blake Avenue is in the area of East New York known as the “Bamas.” According to TFCU’s records, CC-3’s address was in Riverhead, New York.

m. TFCU records indicate that Check 758 was returned on June 19, 2019. \$2,714.09 was debited from CC-3’s account and TFCU also charged CC-3’s account a fee of \$15 for a “returned deposited item.” CC-3 closed the TFCU account on June 24, 2019.

n. Records provided by HSBC indicate that Check 758 was drawn on Jane Doe’s account on June 17, 2019. On June 18, 2019, Jane Doe’s account was charged a “Service Fee for Insufficient Funds” in connection with Check 758. It appears

from the HSBC records that on June 21, 2019, HSBC credited Jane Doe's account with \$2,714.09 and returned the "Service Fee" on June 24, 2019.

5. I am aware that "Waze" is a cellphone application that uses the Global Positioning System ("GPS") to provide a cellphone user with driving directions to a location entered by the user. Information contained on the Device indicates that WILLIAMS used "Waze" to get directions to 1638 Merrick Road in Merrick, New York, on June 13, 2019 at 3:58 p.m., i.e., approximately six minutes after he informed CC-2 that he was downstairs, and approximately one hour and 12 minutes before WILLIAMS deposited Check 758 into CC-3's TFCU account at the TFCU branch in Merrick, New York. 1638 Merrick Road is the street address for the TFCU located in Merrick, New York. The shopping center in which the TFCU is located is called "Merrick Commons," as reflected on the ATM receipt described above.

6. I have interviewed Jane Doe and she confirmed that the HSBC account on which Check 758 was drawn belongs to her, and that she was a victim of fraud through her HSBC account. She confirmed that she was not aware of any entity known as "Business Resources Services" and that she had not given consent for her HSBC account number to be used in connection with the scheme described above.

REQUEST FOR SEALING

7. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and arrest warrant, as disclosure would give the target of the investigation an opportunity to change patterns of behavior and flee from or evade prosecution and therefore

have a significant and negative impact on the continuing investigation that may severely jeopardize its effectiveness.

WHEREFORE, your deponent respectfully requests that the defendant COREY WILLIAMS, be dealt with according to law.



MATTHEW WIEDEMER
Special Agent, Federal Bureau of Investigation

Sworn to before me this
9 day of August, 2021



THE HONORABLE SANKET J. BULSARA
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK